

Rachel C. Strickland
Aaron E. Nathan
James H. Burbage
WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
New York, NY 10019
Telephone: (212) 728-8000
Facsimile: (212) 728-8111
rstrickland@willkie.com
anathan@willkie.com
jburbage@willkie.com

Michael J. Gottlieb
Meryl Governski (admitted *pro hac vice*)
WILLKIE FARR & GALLAGHER LLP
1875 K Street NW
Washington, DC 20006
mgottlieb@willkie.com
mgovernski@willkie.com

Von A. DuBose (*pro hac vice* forthcoming)
DUBOSE MILLER LLC
75 14th Street NE
Suite 2110
Atlanta, GA 30309
Telephone: (404) 720-8111
dubose@dubosemiller.com

Rachel Goodman
John Langford
UNITED TO PROTECT DEMOCRACY
82 Nassau Street, #601
New York, NY 10038
Telephone: (202) 579-4582
rachel.goodman@protectdemocracy.org
john.langford@protectdemocracy.org

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RUDOLPH W. GIULIANI
a/k/a RUDOLPH WILLIAM GIULIANI

Debtor.

Chapter 11

Case No. 23-12055 (SHL)

**JOINDER OF RUBY FREEMAN AND
WANDREA' ARSHAYE MOSS TO THE
OBJECTION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO THE DEBTOR'S APPLICATION
FOR RETENTION AND EMPLOYMENT OF KENNETH CARUSO
LAW LLC AS SPECIAL LITIGATION COUNSEL EFFECTIVE MARCH 20, 2024**

Ms. Ruby Freeman and Ms. Wandrea' ArShaye "Shaye" Moss (the "Freeman Plaintiffs"), as creditors and parties-in-interest of Mr. Rudolph W. Giuliani a/k/a Rudolph William Giuliani (the "Debtor"), by and through their undersigned counsel, hereby submit this joinder to the

Objection of the Official Committee of Unsecured Creditors of Rudolph W. Giuliani to the Debtor's Application for Retention and Employment of Kenneth Caruso Law LLC as Special Litigation Counsel Effective March 20, 2024 (the “KCL Objection”) [Docket No. 200].¹

JOINDER

1. Despite not having authority to pursue an appeal of the Freeman Judgment, Mr. Giuliani is now seeking to retain his *second* special litigation counsel for that matter. The court should deny the application to retain Kenneth Caruso Law LLC (the “KCL Application”) for the reasons set forth in the KCL Objection. Put simply, the KCL Application is predicated on the faulty premise that the Court will grant the *Debtor’s Motion for an Order Modifying the Automatic Stay for the Limited Purposes of Allowing the Debtor to Proceed with Prosecuting and Perfecting the Freeman Appeal Before the D.C. Circuit* [Docket No. 195] (the “Stay Relief Motion”). As will be explained in the Freeman Plaintiffs’ forthcoming objection, there is no basis for granting the Stay Relief Motion in light of (a) applicable law, (b) the Stay Relief Motion’s deficiencies, (c) the creditor community’s uniform opposition to the Stay Relief Motion, and (d) Mr. Giuliani’s failure to timely comply with basic requirements of being a chapter 11 debtor in possession. Absent the Stay Relief Motion being granted, there is no basis for granting the KCL Application. Accordingly, for the reasons set forth herein and in the KCL Objection, the KCL Application should be denied.

[*Remainder of Page Left Intentionally Blank*]

¹ Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the KCL Objection.

CONCLUSION

WHEREFORE, for the foregoing reasons, the Freeman Plaintiffs join the Committee's KCL Objection and respectfully request that the Court deny the relief requested in the KCL Application.

Dated: May 3, 2024

By: /s/ Rachel C. Strickland

Rachel C. Strickland
Aaron E. Nathan
James H. Burbage
WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
New York, NY 10019
Telephone: (212) 728-8000
Facsimile: (212) 728-8111
rstrickland@willkie.com
anathan@willkie.com
jburbage@willkie.com

Michael J. Gottlieb
Meryl C. Governski (admitted *pro hac vice*)
WILLKIE FARR & GALLAGHER LLP
1875 K Street NW
Washington, DC 20006
mgottlieb@willkie.com
mgovernski@willkie.com

Von A. DuBose (*pro hac vice* forthcoming)
DUBOSE MILLER LLC
75 14th Street NE
Suite 2110
Atlanta, GA 30309
Telephone: (404) 720-8111
dubose@dubosemiller.com

Rachel Goodman
John Langford
UNITED TO PROTECT DEMOCRACY
82 Nassau Street, #601
New York, NY 10038
Telephone: (202) 579-4582
rachel.goodman@protectdemocracy.org
john.langford@protectdemocracy.org